

May 29, 2013

Office of Environmental Information Docket (Mail Code: 2822T)
Docket # EPA-HQ-ORD-2013-0189
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W. Washington, DC 20460

SUBJ: Comments on Revised Draft Watershed Assessment for Bristol Bay

Thank you for the opportunity for The Nature Conservancy to provide input to the recently released revision of the *Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska*. (aka Revised Draft Watershed Assessment). The mission of The Nature Conservancy is to conserve the lands and waters on which all life depends. We are a science-based organization that brings a collaborative approach to solving the pressing conservation challenges that confront all of us. We have operated across Alaska through an Alaska Chapter that was formed in 1988.

Over the past 20 years, The Nature Conservancy has been deeply involved in conservation efforts in Bristol Bay. We have:

- Purchased a number of key properties throughout the region to protect the significant biological, economic, and cultural values inherent in those lands.
- Helped develop local conservation capacity by helping to form the Nushagak-Mulchatna Watershed Council and the Bristol Bay Heritage Land Trust.
- Broadened the constituency for conservation through support of the annual Fly Fishing Guide Academy and Salmon Camp.
- Brought conservation planning tools to partners in the region, including completion of the first comprehensive ecoregional biodiversity assessment for the Bristol Bay Lowlands ecoregion, development of the *Nushagak River Watershed Traditional Use Area Conservation Plan*, and conservation plans for individual Native village corporation lands on the Nushagak River.

More recently, as the potential for large scale mining in the region has emerged, The Nature Conservancy has invested approximately four years and three million dollars to better understand salmon habitat use, water flows, and potential risks to salmon and aquatic habitats associated with large-scale hard rock mining.

In our first set of public comments regarding the Draft Watershed Assessment, we concluded that at a general level, our work corroborates and supports the EPA's findings in the Draft Watershed Assessment and that we believe EPA used appropriate scenarios to establish potential risks of types and scale of risks consistent with our analyses. Since publication of the External Peer Review of EPA's Draft Document and the Revised Draft Watershed Assessment, we have also reviewed both documents to evaluate changes in the context of comments made by the formal peer review as well as general findings of our work and analyses. Our specific comments regarding the peer review and subsequent revised draft are as follows:

- The reorganization of the assessment, as recommended by the peer review, to clarify the purpose and scope and to reflect the ecological risk assessment approach, has resulted in a more compelling and useful document.

- Expansion of subject matter into more detailed analysis of water quality impacts, drainage of waste rock leachate, effects of the potential transportation corridor, and mine site water balance as suggested by the peer review and public comments, is appreciated and generally corroborates with our own analyses.
- Although the document has clarified why the assessment scope for wildlife and humans was limited to fish-mediated impacts and Alaska Native cultures, it has not expanded the scope in this regard. A more comprehensive assessment of impacts to the Nushagak River and Kvichak River watersheds that includes other impacts would be especially relevant to understanding potential effects on Alaska Native culture and other human uses, as well as overall biological diversity and productivity.
- Although the document has added a useful analysis concerning the quantity, quality, and diversity of aquatic habitats within the Nushagak River and Kvichak River watersheds, this analysis has not been thoroughly incorporated throughout the assessment to better understand spatially explicit impacts of the risk scenarios on aquatic habitats and their relative contributions to fish populations.
- The inclusion of a discussion on potential mitigation efforts in response to large-scale hardrock mining in the Bristol Bay watershed is responsive to the request by the peer review process and many public comments for this inclusion while effectively conveying the difficulties and inherent uncertainty associated with these approaches in this region.

In conclusion, the Revised Draft Watershed Assessment continues to generally corroborate our own work and analyses. Thank you again for the opportunity to provide input to the Draft Watershed Assessment. We appreciate EPA's deliberative efforts to clearly identify areas of potential risk associated with potential large-scale mining in Bristol Bay.

Sincerely,



Randall H. Hagenstein
Alaska State Director